

STATE IDENTIFICATION NUMBER
(If Applicable)

US EPA RECORDS CENTER REGION 5



482088

EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A - General Facility Standards

I. General Information:

(A) Facility Name: K-O-I Petroleum, Inc
(b) Street: 421 Lycastr
(C) City: Detroit (D) State: MI (E) Zip Code: 48214
(F) Phone: _____ (G) County: Wayne
(H) Operator: K-O-I Petroleum, Inc.
(I) Street: _____
(J) City: _____ (K) State: _____ (L) Zip Code _____
(M) Phone: _____ (N) County: _____
(U) Owner: Chem - Dyne Corp
(P) Street: _____
(Q) City: _____ (R) State: _____ (S) Zip Code: _____
(T) Phone: _____ (U) County: _____
(V) Date of Inspection: 4/30/81 (W) Time of Inspection (From) 9³⁰ (To) 12⁰⁰
(X) Weather Conditions: clear sunny cool

(Y) Person(s) Interviewed	Title	Telephone
_____	_____	_____
_____	_____	_____
_____	_____	_____

(Z) Inspection Participants	Agency/Title	Telephone
<u>R.M. Buckley</u>	<u>USEPA Chief MIEHS</u>	<u>313 - 676 - 6500</u>
<u>D.D. Schultz</u>	<u>MDNR/WQ Specials</u>	<u>517 - 373 - 2794</u>
<u>W Benson</u>	<u>WCAPCD - AP Ins</u>	<u>313 224 - 4650</u>

(AA) Preparer Information		
Name <u>Robert M. Buckley</u>	Agency/Title <u>USEPA EDO, Chief MIEHS</u>	Telephone <u>(313) 226 - 7269</u>

II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- | | |
|---|--|
| <p><input checked="" type="checkbox"/> A. Storage and/or Treatment</p> <p style="margin-left: 20px;"> <input checked="" type="checkbox"/> 1. Containers (I)
 <input checked="" type="checkbox"/> 2. Tanks (J)
 <input type="checkbox"/> 3. Surface Impoundments (K)
 <input checked="" type="checkbox"/> 4. Waste Piles (L) </p> <p><input type="checkbox"/> B. Land Treatment (M)</p> <p><input type="checkbox"/> C. Landfills (N)</p> | <p><input checked="" type="checkbox"/> D. Incineration and/or Thermal Treatment (O and P) <u>proposed</u></p> <p><input checked="" type="checkbox"/> E. Chemical, Physical, and Biological Treatment (Q) <u>proposed for existing wastes on site</u></p> |
|---|--|

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

III. GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

Yes	No	NI*	Remark
-----	----	-----	--------

(A) Has the Regional Administrator been notified regarding:

1. Receipt of hazardous waste from a foreign source?

2. Facility expansion?

(b) General Waste Analysis:

1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?

2. Does the owner or operator have detailed waste analysis plan on file at the facility?

3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

(C) Security - Do security measures include:
(if applicable)

1. 24-Hour surveillance?

2. Artificial or natural barrier around facility?

3. Controlled entry?

4. Danger sign(s) at entrance?

(D) Do Owner or Operator Inspections Include:

1. Records of malfunctions?

2. Records of operator error?

3. Records of discharges?

*Not Inspected

3

* Office had some records of this type scattered about

III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule:	—	—	<u>X</u>	<u>No Records</u>
5. Safety, emergency equipment?	—	—	<u>X</u>	
6. Security devices?	—	—	—	<u>Inoperative</u>
7. Operating and structural devices?	—	—	—	
8. Inspection log?	—	—	—	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job Titles?	—	—	—	<u>N/A</u>
2. Job Descriptions?	—	—	—	
3. Description of Training?	—	—	—	
4. Records of Training?	—	—	—	
5. Have facility personnel received required training by 5-19-81?	—	—	—	
6. Do new personnel receive required training within six months?	—	—	—	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	—	<u>X</u>	—	
2. No smoking signs?	<u>X</u>	—	—	<u>no water need to be cleaned</u>
3. Separation and protection from ignition sources?	<u>?</u>	—	—	<u>probable</u>

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 26b Subpart C)

(A) Maintenance and Operation
of Facility:

1. Is there any evidence of fire,
explosion, or release of
hazardous waste or hazardous
waste constituent?

___ ? ___ except for broken
drums on site.

(b) If required, does the Facility
have the Following Equipment:

1. Internal communications or
alarm systems?

___ ___ ___ Unk pro b. in oper

2. Telephone or 2-way Radios
at the scene of operations?

___ X ___ telephone inoperative

3. Portable fire extinguishers,
fire control, spill control
equipment and decontamination
equipment?

___ X ___ none at scene

Indicate the volume of water and/or foam available for fire control:

Units: Unk

(C) Testing and Maintenance of
Emergency Equipment:

1. Has the Owner or Operator
established Testing and
Maintenance Procedures
for Emergency Equipment?

___ ___ ___ No Records

2. Is Emergency Equipment
maintained in Operable
Conditions?

___ ___ ___ No Records

(D) Has Owner or Operator Provided
Immediate Access to Internal Alarms?
(if needed)

___ ___ ___

*Not Inspected

(E) Is there adequate aisle space
for unobstructed movement?

?

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:
(Part 265 Subpart D)

(A) Does the contingency Plan contain the
following information:

Yes No NI*

No Contingency Plan.
Remarks

1. The actions facility personnel
must take to comply with
§265.51 and 265.56 in response
to fires, explosions, or any
unplanned release of hazardous
waste? (If the owner has a Spill
Prevention, Control, and Counter-
measures (SPCC) Plan, he needs
only to amend that plan to
incorporate hazardous waste
management provisions that are
sufficient to comply with the
requirements of this Part (as
applicable.)
2. Arrangements agreed to by local
police departments, fire departments
hospitals, contractors, and State
and local emergency response teams
to coordinate emergency services
pursuant to §265.37?
3. Names, addresses, and phone
numbers (office and home) of all
persons qualified to act as
emergency coordinators?
4. A list of all emergency equipment
at the facility which includes the
location and physical description
of each item on the list and a
brief outline of its capabilities?
5. An evacuation plan for facility
personnel where there is a possibility
that evacuation could be necessary?
(This plan must describe signal(s)
to be used to begin evacuation,
evacuation routes, and alternate
evacuation routes?)

11-11

✓

✓

✓

✓

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

Yes No NI* Remarks

(b) Are copies of the Contingency Plan Available at Site and local Emergency Organizations?

X

(c) Emergency Coordinator

1. Is the facility Emergency Coordinator identified?

X

2. Is coordinator familiar with all aspects of site operation and emergency procedures?

N/A

3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?

N/A

(d) Emergency Procedures

If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?

N/A

VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

Yes No NI* Remarks

(A) Use of Manifest System

1. Does the facility follow the procedures listed in §265.71 for processing each Manifest?

✓

2. Are records of past shipments retained for 3 years

✓

(b) Does the owner or operator meet requirements regarding Manifest Discrepancies?

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

_ _ _ ✓ _ _ _

2. Does the operating record contain the following information:

- ***b. The method(s) and date(s) of each wastes treatment, storage, or disposal as required in Appendix I?

_ _ _ ✓ _ _ _

- c. The location and quantity of each hazardous waste within the facility?

_ _ _ ✓ _ _ _

- ***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest numbers if waste was accompanied by a manifest.)

_ _ _ Not Applicable

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

- f. Reports detailing all incidents that required implementation of the contingency plan?

_ _ _

- g. All closure and past closure costs as applicable? (Effective 5-19-81)

_ _ _

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Closure Plan Available for Inspection by May 19, 1981?	—	—	—	<u>N/A</u>
2. Has this plan been submitted to the Regional Administrator	—	—	—	—
3. Has Closure begun?	—	—	—	—
4. Is closure estimate available by May 19, 1981?	—	—	—	—
(B) Post Closure Care and Use of Property				
Has the Owner or Operator supplied a Post Closure Monitoring Plan (by May 19, 1981)?				
	—	—	—	—

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

**I
USE AND MANAGEMENT OF CONTAINERS**

Facility Name: _____ Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are containers in good condition?	—	<u>X</u>	—	
2. Are containers compatible with waste in them?	<u>X</u>	—	—	—
3. Are containers stored closed?	—	<u>X</u>	—	
4. Are containers managed to prevent leaks?	—	<u>X</u>	—	
5. Are containers inspected weekly for leaks and defects?	—	<u>X</u>	—	
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line?	—	<u>X</u>	—	Indicate if waste is: <u>X</u> Ignitable, <u> </u> Reactive

*Not Inspected

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	—	—	X	Unknown
8. Are containers of incompatible wastes separated or protected from each other physical barriers or sufficient distance?	—	—	X	Unknown

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?	—	—	—	Unknown
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?	X	—	—	—
3. Do continuous feed systems have a waste-feed cutoff?	—	—	—	Unknown
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?	—	—	—	Unknown
5. Are required daily and weekly inspections done?	—	X	—	—
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	—	X	—	Indicate if waste is: <input checked="" type="checkbox"/> Ignitable <input type="checkbox"/> Reactive
7. Are incompatible waste stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)	—	—	—	Unknown

8. Has the owner or operator observed the National Fire Protection Associations buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Code - 1977" to determine compliance.)

Unknown

^K
SURFACE IMPOUNDMENTS

None N/A

Facility Name: _____

Date of Inspection: _____

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?
2. Do earthen dikes have protective covers?
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?
4. Is the freeboard level inspected at least daily?
5. Are the dikes inspected weekly for evidence of leaks or deterioration?
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)

_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____
_____	_____	_____	_____

L
WASTE PILES *N/A*

Facility Name: _____

Date of Inspection: _____

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from the wind?	_____	_____	_____	_____
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	_____	_____	_____	_____
3. Are leachate, run-off, and run-on controlled? (The effective date of this provision is Nov. 19, 1981.)	_____	_____	_____	_____
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	_____	_____	_____	_____
<i>Indicate if waste is: <input type="checkbox"/> Ignitable, <input type="checkbox"/> Reactive</i>				
5. Are piles of reactive or ignitable waste protected?	_____	_____	_____	_____
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	_____	_____	_____	_____
7. Are piles of incompatible waste protected by barriers or distance from other waste?	_____	_____	_____	_____

** Some sand "*

M

LAND TREATMENT *N/A*

Facility Name: _____

Date of Inspection: _____

1. Is hazardous waste ^{treated} capable of biological or chemical degradation? _____
2. Are run-off and run-on diverted from the facility or collected (Effective date: November 19, 1981)? _____
3. Is waste analyzed according to 265.273? _____
4. If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276? _____
5. Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available? _____
6. Does the unsaturated zone monitoring plan address the minimum information specified in 265.278? _____
7. *Are records kept regarding application dates, and rates, quantities, and locations of all hazardous waste placed in the facility?* _____
8. Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? *Indicate if waste is: ☐ Ignitable ☐ React* _____
9. Are incompatible wastes land treated? (If yes, 265.17(b) applies) _____

*Not Inspected

N
LANDFILLS

N/A

Facility Name: _____ Date of Inspection: _____

Yes No NI* Remarks

(A) General Operating Requirements
Does the facility provide the following:

- | | | | | |
|---|-------|-------|-------|--|
| **1. Diversion of run-on away from active portions of the fill? | _____ | _____ | _____ | |
| **2. Collection of run-off from active portions of the fill? | _____ | _____ | _____ | |
| **3. Is collected run off treated? | _____ | _____ | _____ | |
| 4. Control of wind disposal of hazardous waste? | _____ | _____ | _____ | |

(**Effective 11-19-81)

(B) Surveying and Recordkeeping
Does the Operating Record Include:

- | | | | | |
|--|-------|-------|-------|--|
| 1. A map showing the exact location and dimensions of each cell? | _____ | _____ | _____ | |
| 2. The contents of each cell and the location of each hazardous waste type within each cell? | _____ | _____ | _____ | |

(C) Closure and Post-Closure

- | | | | | |
|--|-------|-------|-------|--|
| 1. Is the Closure Plan available for inspection by 5-19-81? | _____ | _____ | _____ | |
| 2. Has this plan been submitted to the Regional Administrator? | _____ | _____ | _____ | |
| 3. Has Closure begun? | _____ | _____ | _____ | |
| 4. Is Closure cost estimate available by 5-19-81? | _____ | _____ | _____ | |

(D) Special requirements ^{for} ~~for~~ ignitable or reactive waste

Are ignitable or reactive wastes treated so the resulting mixture is no longer ignitable or reactive?

Yes No NI* Remarks

(If waste is rendered non-reactive or non-ignitable see treatment requirements)

If not, the provisions of 40 CFR 265.17(b) apply.

(E) Special requirements for Incompatible Wastes.

Does the owner or operator dispose of incompatible wastes in separate cells?

If not, the provisions of 40 CFR 265.17(b) apply.

(F) Special requirements for liquid waste (effective 11-19-81)

1. Are bulk or non-containerized liquids placed in the landfill?

2. Does the landfill have a chemically and physically resistant liner system?

3. Does the landfill have a functional leachate collection system?

4. Are free liquids stabilized prior to or immediately after placement in the landfill?

(G) Special requirements for Containers (effective 11-19-81)

Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?

O and P
INCINERATION and THERMAL TREATMENT

N / F

(A) Facility Name: _____

(B) Date of Inspection: _____

I. Determination of Steady State

A. Type of unit (i.e., type of incinerator or thermal treatment:): _____

B. Components and steady state condition:

**** Was this component at SS prior to adding waste?

Component	Yes	No	NI*	Remarks
1. _____	_____	_____	_____	_____
2. _____	_____	_____	_____	_____
3. _____	_____	_____	_____	_____
4. _____	_____	_____	_____	_____
5. _____	_____	_____	_____	_____

II. Waste Analysis

A. Minimum requirements, for wastes not previously burned/treated.

1. Required analyses; has an analysis been performed for the following:	Yes	No	NI*	Remarks
a. Heating value	_____	_____	_____	_____
b. Halogen content	_____	_____	_____	_____
c. Sulfur content	_____	_____	_____	_____

*Not Inspected

Yes No NI* Remarks

2. Documented, written data may be substituted for analysis for these. Are either present for:

a. Lead?

b. Mercury?

B. Other parameters for which the waste is tested to enable owner or operator to establish steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested for.)

Remarks

1. _____

2. _____

3. _____

4. _____

5. _____

III. Monitoring and Inspections

Yes No NI* Remarks

A. Combustion/emission control instruments monitored at least every 15 minutes

B. Steady state maintained or corrections attempted?

C. Stack Plume observed at least hourly for normal color and opacity?

D. Did any stack observations made by owner or operator show a plume different than normal?**

E. If yes to D above, were corrections made to return emissions to normal appearance?**

F. Complete unit and associated equipment inspected daily for leaks, spills, and fugitive emissions?

G. Emergency shutdown controls, system alarms checked daily for proper operation?

*Not Inspected

**Specify in Remarks for what period of time this was checked.

IV. Open Burning

A. Only complete this part if the facility open burns hazardous waste.

	Yes	No	NI*	Remarks
1. Does this facility burn <u>only</u> waste explosives? (A <u>No</u> answer means <u>other</u> hazardous waste is open-burned.)	—	—	—	N/A
2. If this facility open-burns waste explosive, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)	—	—	—	N/A

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others	
0 to 100.....	204 m	670 ft
101 to 1,000.....	380 m	1,250 ft
1,001 to 10,000.....	530 m	1,730 ft
10,001 to 30,000.....	690 m	2,260 ft

Q CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Facility Name: _____

Date of Inspection: _____

	yes	No	NI*	Remarks
1. Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?	—	—	*	unknown
2. Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)	—	—	*	N/A

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	<u>2</u>	—	—	<u>There are analyses</u>
4. Are inspection procedures followed according to 265.403?	—	—	—	<u>N/A</u>
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—	—	—
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	—	—	—	—

Exempt - pretreatment to Detroit

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.2 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the Manifest available for review?	—	<u>X</u>	<u>X</u>	
(B) Do the Manifest forms reviewed contain the following information: (If possible, make copies of/or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	—	—	<u>X</u>	
2. Name, mailing address, telephone number, and EPA ID Number of Generator	—	—	<u>X</u>	

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	<u>—</u>	<u>X</u>	<u>—</u>	<u>N/A</u>
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days	<u>—</u>	<u>X</u>	<u>—</u>	<u>refers to existing wastes to existing owner</u>
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	<u>—</u>	<u>X</u>	<u>—</u>	<u>refers to Q/15</u>
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?	<u>—</u>	<u>—</u>	<u>*</u>	<u>unknown</u>
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	<u>—</u>	<u>—</u>	<u>—</u>	<u>N/A</u> no uncovered
c. Do continuous feed systems have a waste-feed cutoff?	<u>—</u>	<u>—</u>	<u>*</u>	<u>unknown</u>
d. Are required daily and weekly inspections done?	<u>—</u>	<u>X</u>	<u>—</u>	<u>—</u>
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?	<u>—</u>	<u>—</u>	<u>*</u>	<u>unknown</u>
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)	<u>—</u>	<u>—</u>	<u>*</u>	<u>unknown</u>

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	_____	_____	*	_____
(B) Has the Generator submitted Annual Reports and Exception Reports as required?	_____	_____	*	N/A

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

(A) Has the installation imported or exported Hazardous Waste?	___	_____	_____	not since 11/19/80
--	----------------	-------	-------	--------------------

(If A was answered Yes, then complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	_____	_____	_____	N/A
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	_____	_____	_____	4
c. Met the Manifest requirements?	_____	_____	_____	4
2. Importing Hazardous Waste, has the generator:				
a. Met the manifest requirements?	_____	_____	_____	11

X
TRANSPORTER REQUIREMENTS
40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

I. MANIFEST SYSTEM AND RECORDKEEPING
(Subpart B)

	Yes	No	NI*	Remarks
(A) Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?	___	___	___	<i>N/A nothing transported since requirements went into effect</i>

II. INTERNATIONAL SHIPMENTS

A. Does the Transporter record on the manifest the date the waste left the U.S.?	___	___	___	<i>N/A</i>
B. Are signed completed manifest(s) on file?	___	___	___	<i>N/A</i>

V. MISCELLANEOUS

A. Does Transporter transport hazardous waste into the U.S. from abroad	___	___	___	<i>N/A</i>
B. Does the Transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?	___	___	___	<i>N/A</i>

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

No site activity. Essentially same as Feb 80 inspection.
One (1) white recovery observed which appears new, possibly placed by or at request of City of Detroit due to fumes "complaint".
gate on Ly caste wide open. facility office building vandalized plumbing etc. bldg in disrepair - some mild odors on site especially when on top of certain tanks on tank farm.
Water on whse bldg floor, one possible drain open. cracks observed on dike but has concrete floor. horizontal tank supports concrete splayed. Misc. debris & trash around dike access hampered by brush on Freud street side.
hole in ground at fire hydrant.